STATEMENT OF BASIS

Eastern Associated Terminals Company, LLC
Phosphate Handling and Storage Facility
Facility ID No.: 0570014
Hillsborough County

Title V Air Operation Permit Renewal
DRAFT Permit Project No.: 0570014-022-AV

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This permit is for the renewal of a fertilizer product (MAP, DAP, GTSP) and phosphate rock material handling facility. This permit also incorporates Permit No. 0570014-023-AC, which is being used concurrently with Permit No. 0570014-022-AV. Permit No. 0570014-023-AC is being issued to accurately reflect potential emissions from the handling of material that is coated with a dust suppressant.

Previously, the particulate matter (PM) potential to emit (PTE) of the material handling operation was based on the grain loading limitation of the baghouses controlling the transfer points and the hours of operation. However, the baghouses are not routinely operated because of sufficient control provided by coatings that are added to the phosphate products. Therefore, the PM PTE is being revised to accurately reflect potential emissions from the handling of material without the baghouses operating.

The revised PTE for MAP, DAP, and GTSP is based on an emission factor of 0.065 lb/ton from a stack test performed at a similar source while handling oiled DAP. Also, the revised PTE for phosphate rock is based on an emission factor of 0.24 lb/ton from a stack test performed at a similar source while handling phosphate rock. Control efficiencies of 70% to 99% were applied to each transfer point based on the type of control at each transfer point. Also, an additional control efficiency of 80% was applied to the handling of MAP, DAP, and GTSP for oiling. Based on a throughput of 3,600,000 tons of MAP, DAP, and GTSP, a throughput of 1,250,000 tons of dry phosphate rock, and the emission factors and control efficiencies listed above, the revised PM PTE for the facility is 235 tons/year.

The facility's operation includes receiving bulk materials by railcar and conveying the material to one of two areas in a storage building. When ready to be loaded into a ship, material is loaded into marine vessels using a series of conveyor belts. The facility is permitted to handle monoammonium phosphate (MAP), diammonium phosphate (DAP), triple superphosphate (GTSP), dry phosphate rock, and wet phosphate rock. MAP, DAP,

GTSP, and dry phosphate rock are stored inside of the storage building. Wet phosphate rock can be stored outdoors. Particulate matter emissions are minimized by coating the MAP, DAP, and GTSP material with a dust suppressant and/or the utilization of ten baghouses.

Emission Unit No. 003, Railcar Unloading

Material (MAP, DAP, GTSP, wet phosphate rock, and dry phosphate rock) is delivered to the facility by railcar. The cars are emptied by a rotary dumper which attaches to the railcars and inverts them. The dumper is contained within a two-sided enclosure that also contains a roof. Plastic curtains hang at the ends of the building to partially enclose the front and back of the building. Particulate matter emissions from railcar unloading are controlled by a 154,670 DSCFM Micro-Pulsaire, Model 2G-8, baghouse.

Emission Unit Nos. 002, 004, 011 – 016 - Conveyors Transfer Points and Storage Building

Enclosed Conveyor Belt No. 2 (C2) conveys material from the railcar dumper building to either enclosed Conveyor Belt No. 7 (C7) or open Conveyor Belt No. 3 (C3). If material is directed to C7, the transfer point from C2 to C7 is enclosed within a building. C7 then conveys material to either enclosed Conveyor Belt No. 9 (C9) or to enclosed Conveyor Belt No. 8 (C8). If material is conveyed to C9, C9 conveys the material into the southeast side of the storage building. If material is directed to C8, C8 conveys material to enclosed Conveyor Belt No. 10 (C10), which then conveys the material into the northwest side of the storage building. Both sides of the storage buildings have conveyors (C9 to Storage Pile & C10 to Storage Pile) which feed radial stacker-reclaimers which stacks the material onto storage piles inside of the storage building. A front-end loader is used to load material onto the stacker-reclaimer when material is ready to be loaded into a ship.

Wet phosphate rock only is conveyed using C3. C3 conveys material to a radial stacker-reclaimer which stacks the material into open storage piles. A front end loader is used to load material onto the stacker-reclaimer when material is ready to be loaded into a ship. The stacker-reclaimer conveys material to Conveyor Belt No. 4 (C4) when it is ready to be loaded into a ship.

Particulate matter emissions from the C2 to C7 transfer point and the C7 to C8 or C9 transfer point (EU No. 004) are controlled by one 9,563 DSCFM Mikro-Pulsaire, Model No. 1F-2, baghouse. However, when this baghouse is not operating, the emissions from the C2 to C7 transfer point are controlled by an enclosure and have been designated as a new EU No. 015.

Particulate matter emissions from the C8 to C10 transfer point are controlled by one 4,500 ACFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse which is vented inside of the storage building. This baghouse is considered an insignificant emissions unit because it vents indoors. However, when this baghouse is not operating, the emissions from the C8 to C10 transfer point are controlled by an enclosure and have been designated as a new EU No. 016.

The storage building is controlled by four identical 79,000 ACFM American Air Filter, Model No. Ameripulse 10-312, baghouses. Two of the baghouses are located on the south side of the storage building (EU Nos. 011 and 012) and two are located on the north side of the building (EU Nos. 013 and 014). In addition, the baghouses on the south side of the storage building (EU Nos. 011 and 012) have an elevator associated with them. Material collected by these baghouses is returned to the storage building using the elevator. The elevator (EU No. 002) is controlled by a 270 DSCFM Flex Kleen, Model No. 84-CT-8, baghouse.

Emission Unit Nos. 006 Conveyor Transfer Point

When material is ready to be loaded into a ship, C9 conveys material from the southeast side of the storage building to enclosed Conveyor No. 4 (C4). The C9 to C4 transfer point is enclosed within a building. C4 then conveys material to Conveyor Belt No. 4A (C4A).

In addition, when material is ready to be loaded into a ship, Conveyor No. 10 (C10) conveys material from the northwest side of the storage building to C4A. The C4 to C4A transfer point and the C10 to C4A transfer points are enclosed within a building.

Particulate matter emissions from the C9 to C4 transfer point (EU No. 006) are controlled by a 4,050 DSCFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse. Particulate matter emissions from the C4 to C4A transfer point and the C10 to C4A transfer point are controlled by two identical 4,500 ACFM Mikro-Pulsaire, Model No. 64S-8-20, baghouses, which vent inside of the building. These baghouses are considered to be insignificant emissions units because they vents indoors.

Emission Unit Nos. 009 and 017 C5 to C6 Transfer Point

Material is conveyed from C4A to Conveyor Belt No. 5 (C5). This transfer point is enclosed within the same building as transfer points C4 to C4A and C10 to C4A. C5 conveys material to enclosed Conveyor Belt No. 6 (C6), which loads the ship using a ship loading spout. C5 has side skirts only to allow the ship loader (gantry) to move and deposit materials throughout the shipholds.

Particulate matter emissions from the C5 to C6 transfer point (EU No. 009) are controlled by a 4,050 DSCFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse. Particulate matter emissions from the ship loading spout (EU No. 001) are controlled by a 46,800 DSCFM Haven, Alpha Mark 1 Size 30, baghouse.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Rule 62-296.711 F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter, for Material Handling, Sizing, Screening, Crushing and Grinding. Based on the Title V Air Operation Permit Renewal application received November 30, 2010, this facility is not a major source of hazardous air pollutants (HAPs). In addition, the emission units controlled by baghouses are subject to CAM.